

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ORNRAT KEAWSRI, et al,

Plaintiffs,

DECLARATION ON MOTION

-against-

RAMEN-YA INC., Y&S INTERNATIONAL
CORP. d/b/a RAMEN-YA, et al,
Defendants.

Docket No. 17-cv-2406 (LJL)

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Howard C. Chun, a duly licensed attorney, certifies the following:

1. I am the attorney for Defendants Y&S INTERNATIONAL CORP. d/b/a RAMEN-YA and KENJI KORA, and make this declaration in support of the motion.
2. I make this motion to seek the following relief:
 - a. to reopen the case for a hearing on the cross claims.
 - b. To reschedule the hearing for October 26, 2023.
3. With respect to reopening the case, my clients cross-claimed against the other co-defendants and nothing has been decided. No trial date or hearing was issued on the claims, and we are seeking to have the cross claims adjudicated.
4. The management agreement has been produced in discovery, so all parties have the relevant evidence. There is no prejudice to either party as the main issues by the Plaintiffs have already been decided, and co-defendants are just seeking to have my client pay whatever he has to evade co-defendants' responsibility.
5. With respect to the hearing for October 26, 2023, I am unavailable that entire week. I have tried to reschedule my other matters when I received word of the hearing date, but am unable to do so. I would respectfully request November 2, 2023 in the afternoon or another date in the afternoon that is amenable to the Court and to opposing counsels for the hearing

Dated: New York, New York
October 16, 2023

Howard Chun

Howard C. Chun
Attorney for Defendants
Y&S INTERNATIONAL CORP., and
KENJI KORA